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Attorneys for Plaintiff-Intervenor

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION

MONTANA MEDICAL  
ASSOCIATION, et al.,

Plaintiffs,  
and

MONTANA NURSES  
ASSOCIATION,

Plaintiff-Intervenors,  
v.  
AUSTEN KNUDSEN, et al.,  
Defendants.

Case No. CV 21-00108-DWM

DECLARATION OF VICKY BYRD

I, Vicky Byrd, declare, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the foregoing is true and correct:

1. I am the Chief Executive Officer of the Montana Nurses Association (“MNA”).

2. I have been a registered nurse since 1989. I started my career as a certified pediatric nurse and in 2002 became a certified oncology nurse.

3. I have worked at a variety of healthcare facilities in Montana and have personal knowledge of the employment and personnel policies of those facilities that applied to me in my work as a nurse.

4. In my position as CEO of MNA, I am very familiar with, and have personal knowledge of, employment and personnel policies at Montana healthcare facilities that employ MNA members.

5. From my experience as a nurse and from my work as CEO of MNA, I am familiar with the requirements of participation in CMS programs and the importance of CMS participation to Montana healthcare facilities.

6. Before the Montana Legislature passed House Bill 702 in 2021, vaccination requirements for nurses were common in CMS-participating Montana healthcare facilities.

7. Before the passage and effective date of House Bill 702, CMS-participating healthcare facilities in Montana required nurses to be vaccinated against multiple diseases as a condition of employment and required nurses to show proof of vaccination.

8. When I worked at St. Peter's Hospital in Helena, MT before the

passage of HB702, St. Peter's Hospital required as a condition of my employment that I be vaccinated against certain diseases and required proof of vaccination.

9. St. Peter's hospital participates in CMS programs.

DATED this 16 day of February, 2022.

  
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Vicky Byrd